

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUMP OPERATIONS, LLC,

Plaintiff,

v.

Case No. 1:25-cv-00703

LIAM HEEGER,

Defendant.

**NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT FOR INJUNCTIVE RELIEF**

Defendant Liam Heeger respectfully moves the Court to dismiss Plaintiff Jump Operations, LLC's Complaint for Injunctive Relief pursuant to Federal Rule of Civil Procedure 12(b)(6). Defendant has set forth the bases for dismissal in an accompanying Memorandum of Law.

WHEREFORE, Defendant respectfully requests the Court enter an Order dismissing Plaintiff's Complaint for Injunctive Relief with prejudice, and for any other further relief the Court deems appropriate.

[signature page follows]

Dated: February 7, 2025

Respectfully submitted,

COOLEY LLP

/s/ Miriam Petrillo

Miriam Petrillo
Cooley LLP
110 N. Wacker Drive
Suite 4200
Chicago, IL 60606-1511
Telephone: (312) 881-6500
Facsimile: (312) 881-6598
mpetrillo@cooley.com

Gerard O’Shea (*pro hac vice* pending)
Erika Freeman (*pro hac vice*)
55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
goshea@cooley.com
efreeman@cooley.com

Joseph D. Lockinger (*pro hac vice*)
1299 Pennsylvania Avenue, N.W.
Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Facsimile: (202) 842-7899
jlockinger@cooley.com

Attorneys for Defendant Liam Heeger

CERTIFICATE OF SERVICE

I, Miriam Petrillo, an attorney, hereby certify that on February 7, 2025, I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of Court via the CM/ECF system, which will send notifications of such filing to all counsel of record.

/s/ Miriam Petrillo

Miriam Petrillo